

Safety, Health, and Environment Policy

North Atlantic Base Metals

At Vale North Atlantic Base Metals (NABM), we are committed to sustainable development – meeting the needs of the present without compromising the ability of future generations to meet their own needs. We believe in Zero Harm - to our people, to our workplaces, to the communities in which we operate and to the natural environment. We demonstrate our commitment to Zero Harm by integrating sound risk management practices in all aspects and cycles of our business, by continuously improving these practices, and by fully merging the concepts of pollution prevention, safety, health, and environment with our economic and production goals. **We are a SafeProduction organization.**

To achieve Zero Harm, the NABM will develop and maintain a Safety, Health, and Environment Management System (SHE-MS) that meets or exceeds legal requirements and international standards of corporate governance and accountability. The management system is consistent with Vale's Global policies for Sustainable Development, and Health and Safety. The principles within the global and NABM policies are consistent with the ISO 14001 Environmental and OHSAS 18001 Safety and Health Management Systems standards, and our sustainable development commitments affirmed through membership in our regional industrial associations.

The following are the underlying principles necessary to deliver on the commitments set out in this policy:

Safety, Health, and Environmental excellence are exemplified by the visible action of leadership.

- Management is accountable to set the example, and to apply the systems and programs to build a culture that engages all people to deliver on the promise of Zero Harm.

Working in a manner that is safe, healthy, and environmentally sound is an accountability for everyone.

- Everyone, employees and contractors, must accept accountability to remain within the established boundaries, to adhere to legislated requirements, to work as trained, and be receptive to coaching.

People involvement is essential.

- Everyone, employees and contractors, must participate in continually managing risk in all aspects of our business.

All injuries, occupational illness, and environmental impacts related to our activities, products and services are preventable.

- We manage risks by incorporating awareness gained from past incidents into proactive planning for normal, abnormal and emergency conditions. This, along with setting objectives and measuring progress against our targets are key for continuous performance improvement in the journey to Zero Harm.

All operating exposures can be safeguarded to ALARA.

- Workplace risk can be reduced and maintained at levels As Low As Reasonable Achievable (ALARA) by using our own and others knowledge and experiences, following established rules and procedures, using leading work practices, and maintaining situational awareness.

Prevention of personal injuries, occupational illnesses, and environmental impacts is good business.

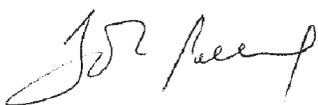
- Excellence in safety, health and environmental performance is a key enabler to achieving the business goals of profit by pursuing growth, reducing costs, achieving margins and competing globally.

Respect for the communities, cultures and customs where we operate is the foundation for productive relationships and social responsibility.

- Engaging internal and external communities of interest in open and transparent communication is essential for sustainable development.

At Vale NABM, there is no higher priority than SafeProduction. As leaders, we have a responsibility to implement and maintain a safe, healthy, and environmentally responsible workplace and effective systems to accomplish work. We recognize the importance of addressing our environmental legacy, through progressive decommissioning, reclamation of contaminated sites, and supporting biodiversity restoration. As employees, we **Plan** our work with risk management, **Accept** our accountability to stay within established boundaries, **Care** for one another, and **Lead** by example to achieve Zero Harm.

This Safety, Health, and Environment Policy is endorsed by the NABM leadership team.



John Pollesel

Director for Base Metals Operations North Atlantic
Vale Canada Chief Operating Officer